



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

93 JUL -6 PM 2:11

RECEIVED

REPLY TO THE ATTENTION OF:

SP-14J

JUN 29 1993

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

James R. Conway, President  
Marion Steel Company  
912 Cheney Avenue  
Marion, Ohio 43302

Re: PCB Spill

Dear Mr. Conway:

This letter pertains to the PCB spill at your facility documented during an inspection on July 7, 1989 by the Ohio Environmental Protection Agency (OEPA).

During the inspection, a sample was collected by the inspector from an oily area beneath the south capacitor bank in the main substation. Results of analyses showed the sample contained 86,000 ppm PCBs. In a letter dated July 21, 1989 from OEPA, Marion Steel was advised of these results and instructed to clean the soil to 25 ppm PCBs and clean any affected solid surfaces to 100 ug/100 cm<sup>2</sup>. Marion Steel was also forwarded a copy of the National Spill Response Policy and advised to document the cleanup as required by the policy.

In a letter dated July 26, 1989 to OEPA, Marion Steel stated that the cleanup was completed. Marion Steel stated further that to confirm PCBs were totally removed, two samples of soil in the cleanup area would be sent out for testing. On August 8, 1989 Marion Steel reported the results of analyses on these two samples to be 1360 ppm and 4500 ppm PCBs. However, Marion Steel felt these results were questionable because of the type of Aroclor identified.

On August 31, 1989 representatives from OEPA returned to Marion Steel and collected a soil sample from the cleanup area. The results of analyses on this sample showed 210 ppm PCBs. These results were forwarded to Marion Steel with instructions to remove additional soil.

documentation from Marion Steel Company showing that the PCB spill discovered during the July 7, 1989 inspection has been cleaned up to 25 ppm PCBs as required. Failure to clean up this spill would constitute improper disposal in violation of the PCB regulations at 40 C.F.R. § 761.60.

Please submit, within 20 days, documentation that 1) the spill has been properly cleaned up, or 2) an explanation of Marion Steel's position in this matter. Please respond directly to John Love, PCB Control Section. If you have any questions about this letter, please call Mr. Love at (312) 886-6845.

Thank you for your cooperation.

Sincerely,

*John Connell*

John Connell, Chief  
PCB Control Section